

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
Rahsaan G. Thomas : No. 18-16902-ELF  
Debtor :

ANSWER TO MOTION OF WELLS FARGO BANK, N.A.  
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. Movant improperly rejected Debtor's payment.
8. Denied.
9. Denied.
10. Denied.
11. Denied.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 3/6/19